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September 30, 2022

VIA CM/ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
(202) 805-0288

Re: Match Group, LLC v. Beazley Underwriting, Ltd., No. 1:22-cv-4629-LGS

Dear Judge Schofield:

Pursuant to the Court's August 4, 2022 Civil Case Management Plan and Scheduling Order in the above captioned action, ECF No. 30, and Section IV.A.2 of Your Honor's Individual Rules and Procedures for Civil Cases, plaintiff Match Group, LLC ("Match") and defendant Beazley Underwriting, Ltd. ("Beazley") and, together with Match, the "Parties") respectfully submit this joint status letter.

Item (a)(1) – What discovery requests have been propounded, who propounded each request and on what date? The Parties propounded Requests for Production of Documents on August 29, 2022. The Parties agreed to serve interrogatories on a rolling basis, provided that the Parties must complete service of interrogatories at least thirty days before the close of discovery, *i.e.*, by November 8, 2022. The Parties propounded their First Set of Interrogatories on September 30, 2022.

Item (a)(2) – What responses were made, who made each response and on what date? Beazley issued its Responses and Objections to Match's Requests for Production on September 21, 2022. Match issued its Responses and Objections to Beazley's Requests for Production on September 29, 2022.

Item (a)(3) – The volume of documents produced, who produced the documents and when? The Parties have not yet produced any documents, but they expect to begin producing



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documents on a rolling basis in the immediate near-term. To facilitate that, the Parties have already identified electronic repositories that are likely to contain responsive documents. The Parties are in the process of collecting (and in some cases have already collected) documents from those electronic repositories. For example, Beazley has collected over 45,000 documents. Match has collected over 500 documents and is working to identify and collect additional responsive documents. In connection with those efforts, Match has retained and is working with an e-discovery vendor. The Parties have also been meeting and conferring on methodologies and protocols that they may adopt to narrow the scope of their document collections and review.

Item (b)(1) – What pleadings have been filed, who filed each pleading and on what date? Match filed the Complaint on June 3, 2022, ECF No. 1, and an Amended Complaint on July 25, 2022, ECF No. 26.

Item (b)(2) – What motions, if any, have been filed, who filed each motion and on what date each motion was filed? Beazley filed its Motion to Dismiss Pursuant to Rule 12(b)(6) on September 2, 2022. ECF No. 33. Match filed its Opposition to the Motion to Dismiss on September 28, 2022. ECF No. 36.

Item (b)(3) – What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed? The only currently pending motion is Beazley's Motion to Dismiss Pursuant to Rule 12(b)(6), filed on September 2, 2022. ECF No. 33. Beazley's Motion to Dismiss is scheduled to be fully briefed on October 7, 2022. *See* Court Order, ECF No. 35.

Item (c) – The parties' plans to ensure that they meet the Court ordered discovery deadlines? The Parties are working diligently and cooperatively to meet the Court's discovery deadlines. The Parties recently held a meet-and-confer to discuss document review protocols, and they have been in regular contact since. The Parties will begin producing documents as soon as practicable in order to meet the Court's November 3, 2022 deadline. The Parties have also agreed to complete service of interrogatories at least thirty days before the close of discovery.

Should Your Honor require any additional information, we invite the Court to contact the Parties.

Respectfully submitted,

/s/ Jonathan S. Zelig
Jonathan S. Zelig

cc: Counsel of record (via CM/ECF)